

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kenneth DeRosa
Paula DeRosa aka Paula Richi
Debtor.

SN Servicing Corporation, as
servicer for U.S. Bank Trust
National Association, as Trustee of
the Lodge Series III Trust
Movant

v.

Kenneth DeRosa
Paula DeRosa aka Paula Richi
William C. Miller, Esq.- Trustee
Respondents.

Case No.: 17-16193-amc

Chapter 13

Judge Ashely M. Chan

**SETTLEMENT STIPULATION RESOLVING CREDITOR, SN SERVICING
CORPORATION, AS SERVICER FOR U.S. BANK TRUST NATIONAL ASSOCIATION,
AS TRUSTEE OF THE LODGE SERIES III TRUST'S
LIMITED OBJECTION TO DEBTOR'S MOTION TO SELL PROPERTY**

AND NOW, upon the Motion of Debtors, Kenneth DeRosa and Paula DeRosa aka Paula Richi (the "Debtor") for Sale of the Property located at 525 N. Swarthmore Avenue, Swarthmore, PA 19081 (the "Property"), and the Limited Objection of Creditor, SN Servicing Corporation, as servicer for U.S. Bank Trust National Association, as Trustee of the Lodge Series III Trust (the "Creditor"), it is hereby agreed as follows:

1. Debtor has entered into an Agreement of Sale for the sale of the Property for the amount of \$784,000.00.
2. The current payoff amount to pay Creditor's loan in full is approximately \$367,148.78, good through August 19, 2022. Should the sale of the Property not take place on or before August 19, 2022, Debtor shall request an updated payoff amount from Creditor.

3. Creditor's Claim shall be paid in full from the proceeds of the sale of the Property, absent further Order of the Court.

4. The parties request that this Honorable Court approve this Stipulation.

Dated: July 27, 2022

/s/ Lauren M. Moyer

Lauren M. Moyer, Esquire
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
Attorney for Creditor

Dated: July 26, 2022

/s/ Brad J. Sadek

Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
Attorney for Debtor

Dated: August 1, 2022

/s/ Jack Miller for*

KENNETH E. WEST
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107
Chapter 13 Trustee

* The Chapter 13 Trustee has no objection to the terms of the herein Stipulation, without prejudice to any of the Chapter 13 Trustee's rights and remedies.